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August 23, 2002

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148

Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the States of Montana, Utah, Washington and Wyoming, Docket No. 02-189

Dear Ms. Dortch:

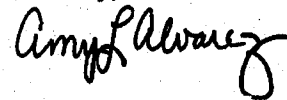
On Thursday, August 22, 2002, David Lawson, Richard Rocchini and the undersigned, all representing AT&T, met with Elizabeth Yockus, Mika Savir, Marcy Greene, Bob Bentley, Cathy Carpino, Gail Cohen and Pamela Megna of the Commission Staff. Participating by telephone were John Finnegan, Ken Wilson and Tim Connolly, also on behalf of AT&T. The purpose of this meeting was to provide Staff with an overview of the non-pricing issues AT&T will raise in its reply comments to be filed in WC Docket No. 02-189.

More specifically, we discussed the impact in the above-referenced proceedings of Qwest's secret, unfiled interconnection agreements and key deficiencies in Qwest's operations support systems, including Qwest's failure to provide a stand alone test environment that mirrors production, the excessive rate of human error in Qwest's processing of CLEC orders, Qwest's high rate of order rejections, the inability of CLECs to integrate EDI pre-ordering and ordering functions successfully, and Qwest's failure to provide UNE-P wholesale bills that are auditable. AT&T further explained that Qwest's bills, unlike those of other BOCs, fail entirely to provide critically important data that are necessary both to audit the bills and confirm their consistency with actual CLEC orders and to facilitate such basic competitive requirements as determining tax liability. For example, unlike other BOCs' bills, Qwest's CRIS-based bills do not provide a breakdown of usage by jurisdiction (i.e., originating minutes of use Local, intraLATA; terminating minutes of use Local, intraLATA, and interLATA) necessary to determine tax liability to the various jurisdictions. In addition, Qwest's bills, again unlike other BOCs' bills, lump non-

recurring and other charges into broad and undefined categories such as "Charge for Unbundled Services (X15)" or "Adjustment for Unbundled Services (X18)" that do not allow reconciliation of specific types of charges (e.g., UNE-P service order charges) with orders.

Consistent with Commission rules, I am filing one electronic copy of this notice in each of the above-referenced proceedings and request that you place it in the record.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez". The signature is fluid and cursive, with a large, stylized "A" and "L".

cc: Michael Carowitz  
Marcy Greene  
Janice Myles  
Gary Remondino  
Elizabeth Yockus